

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
CHATTANOOGA**

KENNETH ANDREW COLBAUGH, §
Individually and as a surviving spouse of §
Tabatha Marie Colbough f/k/a/ §
Tabatha Marie Smith, *et al.*, §
§ No. 1:24-cv-151-DCLC-CHS
Plaintiffs, § Jury Demanded

~V~

MEIGS COUNTY, *et al.*, §
§
Defendants. § CONSOLIDATED

TABITHA MARIE SMITH (Deceased), §
by and through her adult child §
NATHAN ALEXANDER SMITH, *et al.*, §
§ No. 1:24-cv-104- DCLC-CHS
Plaintiffs, §

~V~

MEIGS COUNTY GOVERNMENT, *et al.*, §
§
Defendants. §

**PLAINTIFF NATHAN ALEXANDER SMITH'S UNOPPOSED MOTION FOR
LEAVE TO FILE RESPONSE TO DEFENDANT MEIGS COUNTY GOVERNMENT'S
MOTION TO DISMISS IN EXCESS OF 25-PAGE LIMIT SET BY LOCAL RULE 7.1**

PLAINTIFF, Nathan Alexander Smith ("Plaintiff"), through counsel, and pursuant to E.D. TENN. L.R. 7.1(b), moves this Court to allow an additional 20 pages in his response to the motion to dismiss filed by Meigs County Government ("County"). (DE 22).

Plaintiff avers that the additional pages are necessary to fully address the claims asserted by the County. To be sure, the facts alleged in this matter are unique and raise issues ranging

from pleading standards to Due Process that Plaintiff feels must be extensively discussed.

Consequently, 25 pages may not be enough.

Plaintiff has contacted counsel for the County by phone on June 27, 2024, and said counsel stated they have no objection to this motion.

Wherefore, Plaintiff moves this Court to extend the page limit in his response brief from 25-pages to 45-pages.

Respectfully submitted,

By: /s/ *Robin Ruben Flores*
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CERTIFICATE OF SERVICE

The undersigned attorney for Nathan Alexander Smith hereby certifies that true and exact copies of this motion have been filed and served electronically upon all parties in interest or their counsel as indicated on the receipt issued by the Court's electronic filing system.

By: /s/ Robin Ruben Flores